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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.  
SHORTNACY IN SUPPORT OF  
DEFENDANTS' MOTION TO CONVERT  
ORDER OF DISMISSAL WITHOUT  
PREJUDICE TO ORDER OF DISMISSAL  
WITH PREJUDICE**

This Document Relates to:

*Jane Doe LN v. Uber Technologies, Inc., et al., No. 3:24-cv-00120-CRB*

*Jane Doe TW v. Uber Technologies, Inc., et al., No. 3:24-cv-00559-CRB*

*Jane Doe BW v. Uber Technologies, Inc., et al., No. 3:24-cv-04308-CRB*

*Jane Doe ST v. Uber Technologies, Inc., et al., No. 3:24-cv-04309-CRB*

Date: February 20, 2026  
Time: 10:00 a.m.  
Courtroom: 6 – 17th Floor

1 *Jane Doe AR v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-04313-CRB*

2 *Jane Doe VB v. Uber Technologies, Inc., et*  
 3 *al., No. 3:24-cv-04317-CRB*

4 *Jane Doe KH v. Uber Technologies, Inc.,*  
*et al., No. 3:24-cv-04326-CRB*

5 *Jane Doe SF v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-04327-CRB*

6 *Jane Doe SG v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-04353-CRB*

7 *Jane Doe TW v. Uber Technologies, Inc.,*  
 8 *et al., No. 3:24-cv-04356-CRB*

9 *Jane Doe SW v. Uber Technologies, Inc.,*  
*et al., No. 3:24-cv-04364-CRB*

10 *Jane Doe JG v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-04368-CRB*

11 *Jane Doe PC v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-04374-CRB*

12 *WHB 1478 v. Uber Technologies, Inc., et*  
 13 *al., No. 3:24-cv-04833-CRB*

14 *WHB 1123 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-04850-CRB*

15 *WHB 1144 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-04859-CRB*

16 *WHB 196 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-04886-CRB*

17 *WHB 526 v. Uber Technologies, Inc., et*  
 18 *al., No. 3:24-cv-04901-CRB*

19 *WHB 950 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-04931-CRB*

20 *WHB 1936 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-04950-CRB*

21 *WHB 175 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-04982-CRB*

22 *WHB 1916 v. Uber Technologies, Inc., et*  
 23 *al., No. 3:24-cv-05003-CRB*

24 *WHB 1845 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05015-CRB*

25 *Jane Doe (C.A.) v. Uber Technologies,*  
*Inc., et al., No. 3:24-cv-05072-CRB*

26 *Jane Doe RD v. Uber Technologies, Inc.,*  
*et al., No. 3:24-cv-05074-CRB*

27 *Jane Doe JH v. Uber Technologies, Inc., et*  
 28 *al., No. 3:24-cv-05079-CRB*

1 *WHB 979 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05082-CRB*

2 *WHB 649 v. Uber Technologies, Inc., et*  
3 *al., No. 3:24-cv-05095-CRB*

4 *Jane Doe EB v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05110-CRB*

5 *Jane Doe AE v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05121-CRB*

6 *WHB 1425 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05129-CRB*

7 *WHB 427 v. Uber Technologies, Inc., et*  
8 *al., No. 3:24-cv-05132-CRB*

9 *John Doe DG v. Uber Technologies, Inc.,*  
*et al., No. 3:24-cv-05169-CRB*

10 *Jane Doe KH v. Uber Technologies, Inc.,*  
*et al., No. 3:24-cv-05174-CRB*

11 *WHB 1382 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05232-CRB*

12 *WHB 1962 v. Uber Technologies, Inc., et*  
13 *al., No. 3:24-cv-05240-CRB*

14 *WHB 1549 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05275-CRB*

15 *WHB 1048 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05462-CRB*

16 *WHB 1443 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05472-CRB*

17 *WHB 1596 v. Uber Technologies, Inc., et*  
18 *al., No. 3:24-cv-05473-CRB*

19 *WHB 1673 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05552-CRB*

20 *WHB 519 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05627-CRB*

21 *WHB 393 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05633-CRB*

22 *WHB 1416 v. Uber Technologies, Inc., et*  
23 *al., No. 3:24-cv-05667-CRB*

24 *Jane Doe SK v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05710-CRB*

25 *Jane Doe AM v. Uber Technologies, Inc.,*  
*et al., No. 3:24-cv-05765-CRB*

26 *Jane Doe CS v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05964-CRB*

27 *Jane Doe GT v. Uber Technologies, Inc., et*  
28 *al., No. 3:24-cv-06051-CRB*

1 *John Doe EW v. Uber Technologies, Inc.,*  
*et al., No. 3:24-cv-06073-CRB*

2 *Jane Doe JD v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-06074-CRB*

3 *Jane Doe NLG JV v. Uber Technologies,*  
*Inc., et al., No. 3:24-cv-08622-CRB*

4 *Jane Doe NLG KC v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-00072-CRB*

5 *Jane Doe NLG TT v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-00075-CRB*

6 *Jane Doe NLG PO v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-00358-CRB*

7 *Jane Doe NLG LB v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-00365-CRB*

8 *Jane Doe NLG BH v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-00369-CRB*

9 *Jane Doe NLG BE v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-00401-CRB*

10 *Jane Doe NLG KK v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-00673-CRB*

11 *Jane Doe NLG JN v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-00715-CRB*

12 *WHB 2045 v. Uber Technologies, Inc., et*  
*al., No. 3:25-cv-01211-CRB*

13 *WHB 2052 v. Uber Technologies, Inc., et*  
*al., No. 3:25-cv-01229-CRB*

14 *Jane Doe NLG KL v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-01265-CRB*

15 *Jane Doe NLG AH v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-01266-CRB*

16 *Jane Doe NLG- ZD v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-01729-CRB*

17 *Jane Doe NLG- WB v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-01799-CRB*

18 *Jane Doe NLG- JN v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-01818-CRB*

19 *Jane Doe 691046 v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-02274-CRB*

20 *Jane Doe NLG-KM v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-02706-CRB*

21 *Jane Doe NLG-RR v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-02788-CRB*

22 *Jane Doe NLG-AH v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-02797-CRB*

1 *Jane Doe NLG-AV v. Uber Technologies,*  
2 *Inc., et al., No. 3:25-cv-02855-CRB*

3 *Jane Doe NLG-KM v. Uber Technologies,*  
4 *Inc., et al., No. 3:25-cv-02856-CRB*

5 *Jane Doe NLG-BC v. Uber Technologies,*  
6 *Inc., et al., No. 3:25-cv-02899-CRB*

7 *Jane Doe NLG-KM v. Uber Technologies,*  
8 *Inc., et al., No. 3:25-cv-02956-CRB*

9 *Jane Doe NLG-MH v. Uber Technologies,*  
10 *Inc., et al., No. 3:25-cv-05163-CRB*

**DECLARATION OF MICHAEL B. SHORTNACY**

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, California. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Uber’s”) Motion to Convert Order of Dismissal Without Prejudice to Order of Dismissal with Prejudice.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Uber in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, In Re: Uber Rideshare Cases, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of California, the Bar of the State of New York, and the Bar of the District of Columbia. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. On November 3, 2025, this Court entered Amended Pretrial Order (“PTO”) No. 10 in this matter, re-establishing requirements for Plaintiffs to submit substantially complete Plaintiff Fact Sheets (“PFS”), including a requirement that they be accompanied by a signed declaration or verification. ECF No. 4287 at 8. Amended PTO 10 also established procedures for obtaining relief on a Plaintiff’s failure to comply with the PFS verification requirements. Id. In relevant part, Amended PTO 10 provided that if a Plaintiff was dismissed without prejudice, that Plaintiff had 30 days after the entry of the order of dismissal to either (1) submit the missing information (in this case, a verification), or (2) move to vacate the dismissal. Id. at 9. If a Plaintiff failed to do either of those things, the Plaintiff’s dismissal without prejudice would be subject to conversion to a dismissal with prejudice. Id.

4. On November 19, 2025, upon consideration of Uber’s Amended Motion to Dismiss Cases for Failure to Comply with PTO 10, this Court entered an Order dismissing without prejudice those Plaintiffs identified in Uber’ motion. ECF 4442. The Court further required Plaintiffs’ counsel to file notices of dismissal for those cases subject to the Order. Id. Under Amended PTO 10, Plaintiffs’ deadline to either submit the missing verification of move to vacate the dismissal was therefore thirty

1 days later, on December 19, 2025.

2 5. Attached to this declaration as Exhibit A is a table identifying those Plaintiffs who, as  
3 of January 14, 2026, have failed to either: (1) submit the missing verification; or (2) move to vacate  
4 their Ordered dismissal. Five of the Plaintiffs identified in Exhibit A were dismissed without prejudice  
5 prior to the Court's November 19, 2025 Order. Three of the identified Plaintiffs failed to file any  
6 notice of dismissal as required by that same order.

7 I declare under penalty of perjury that the foregoing is true and correct.

8 Executed on January 15, 2026 in Los Angeles, California.

9 **SHOOK, HARDY & BACON L.L.P.**

10 By: /s/ Michael B. Shortnacy

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